

1 THE HONORABLE RICHARD A. JONES
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,) NO. CR 18-0092-RAJ
11 Plaintiff,) DECLARATION OF ROSS HANSEN
12 vs.)
13 BERNARD ROSS HANSEN,)
14 Defendant.)
15 _____)

16 Ross Hansen declares the following:

17 1. I have reviewed the following emails which have been identified in defendant's prior
18 motion regarding a privilege between myself and attorneys at the law firm of Karr Tuttle
19 Campbell, LLC and Mr. Wyatt. See Dkt 63, Exhibit 1.

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Bates pages	Subject	Date	From:	To:	Summary
55343.346	Request	4/19/16	Friedman	Frush, Vasquez	Client referral
55343.335	Conference Yesterday	4/11/16	Wyatt	Hansen, Friedman, Taylor	Criminal investigation
55343.334	NWTM and Ross Hansen	4/7/16	Wyatt	Friedman	Initial contact

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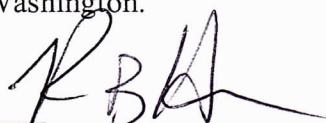
Bates pages	Subject	Date	From:	To:	Summary
55343.330-333	Attorney-client privilege	4/4/16	Friedman	Hansen, Vasquez	Criminal investigation
55343.328-329	Attorney-client privilege	4/3/16	Hansen	Friedman	Criminal investigation
55343.327	Attorney-client	4/3/16	Friedman	Hansen, Vasquez	Criminal investigation
55343.221-226	Tulving Docs	3/29/16	Friedman	Hansen	Tulving prosecution

2. To the best of my recollection, I did not forward or share those emails with anyone other
 10 than the individuals identified in the "To/From" columns above, nor did I discuss the
 11 content of these emails with anyone other than my attorneys.
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 13 3. I declare under penalty of perjury under the laws of the United States of America and the
 14 State of Washington, that the foregoing is true and correct.

15 Executed this 18th day of April, 2019, in Seattle, Washington.

16 s/ Ross Hansen

17 Bernard Ross Hansen



CERTIFICATE OF SERVICE

I certify that on April 18, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

s/ *Alma R Coria*
Senior Legal Assistant